REMARKS

Claims 1 and 10 have been amended to overcome the rejection under 35 U.S.C. § 102(a/e). Support for the amendment may be found in the specification on page 13, lines 7-12.

Claims 1-18 are pending in the application.

By way of this response, Applicant has made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the examiner telephone Peter Scott at (719)533-7969 so that such issues may be resolved as expeditiously as possible.

Response to the rejection under 35 U.S.C. § 102

Claims 1-2, 5-11, and 14-18 stand rejected under 35 U.S.C. § 102(a/e) as being anticipated by Lu et al., U.S. Patent 6,550,045 (Lu). The amendment to Claims 1 and 10 overcomes the rejection as follows.

Claims 1 and 10 have been amended to include only critical paths in the claimed timing groups. The group of clock domains alleged by the rejection to be identical to the claimed timing group does not necessarily include only critical paths. Further, the claimed timing group does not require multiple clock domains as alleged by the rejection. Because the timing group defined by the rejection does not necessarily include only critical paths and because the claimed timing group does not require multiple clock domains as does the timing group defined by the rejection, Claims 1 and 10 are not anticipated under 35 U.S.C. § 102(a/e).

The rejection further alleges that Lu teaches

"assigning each flip-flop to a critical path" in FIGS. 1, 6. However, Claims 1 and 10 recite assigning each flip-flop in a critical path to a timing group, not assigning each flip-flop to a critical path as alleged by the rejection. Because the rejection lacks the claimed step of assigning each flip-flop in a critical path to a timing group, the rejection does not meet the burden required to show anticipation under 35 U.S.C. § 102(e).

The rejection further alleges that FIGS. 1, 6, their description, and column 6 in Lu teach performing a cell placement to minimize a function of propagation delay and maximum distance between flip-flops within each timing group as recited in Claims 1 and 10. However, the rejection lacks the claimed timing group as explained above.

Regarding Claims 2, 5-9, 11 and 14-18, the rejection further alleges in section 6 on page 3 that FIGS. 1 and 6 in Lu teach limitations that are "substantially similar" to those recited in Claims 2, 5-9, 11 and 14-18. However, to show anticipation under 35 U.S.C. § 102, the prior art must teach limitations that are identical to those claimed, not merely similar. Because the rejection applies limitations that are merely similar rather than identical to the claimed limitations, the rejection does not meet the burden required to show anticipation under 35 U.S.C. § 102(a/e).
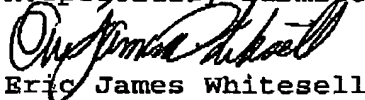
Applicant respectfully requests examination and favorable reconsideration of Claims 1-18.

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   No additional fee is believed due for this
amendment.

        Respectfully submitted,

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